

JUN 18 1987



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

JUN 16 1987

Mr. Frederick Eaton
Environmental Coordinator
W. R. Grace and Company
62 Whittemore Avenue
Cambridge, Massachusetts 02140

Dear Mr. Eaton:

The United States Environmental Protection Agency (EPA) is gathering information on air emissions of asbestos and other mineral fibers from the processing of several mineral substances including vermiculite. Your company has been selected, along with several others that process vermiculite to provide information that will be used in considering the need for national emission standards for hazardous air pollutants for sources of contaminant asbestos under Section 112 of the Clean Air Act, as amended in 1977. We need information on process operations, design and operating parameters of air pollution control equipment, composition and fibrous content of raw materials and intermediate materials processed, and fiber characteristics of the mineral dust collected by air pollution control devices and emitted from these devices.

The information sought is described in Enclosure 1. We request that you provide this information for your crude vermiculite production plants located in Enoree, SC, and Libby, MT, and for your exfoliation plants located in Enoree, SC, and West Chicago, IL. We are sensitive to the amount of labor required to respond to this request, and we have tried to limit it to the data we need for considering whether regulations should be developed and to minimize demands on your time. We are not asking you to perform any new measurements and are requesting your best estimates where measurements are not available. Please respond "not applicable" to questions that do not apply to your operations.

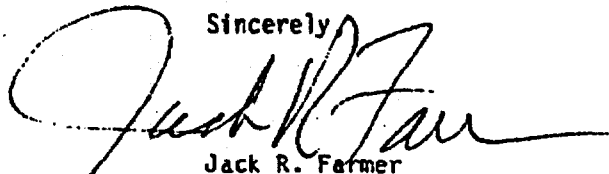
The authority for EPA's information gathering is included in Section 114 of the Clean Air Act (42 U.S.C. 7414). Enclosure 2 contains a summary of this authority. If you believe that disclosure of the information we request would reveal a trade secret, you should clearly identify such information as discussed in the enclosure. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice (40 CFR Part 2.203, September 1, 1976).

All emission data, however, will be available to the public. It will expedite the study and simplify matters if you would separate any information claimed to be confidential from the balance of the information provided.

Currently, there are no contractors assisting EPA in this project. However, any data generated may be furnished, after prior notification to your company, to EPA contractors or others in accordance with the provisions of Enclosure 3, which summarizes Agency and Emission Standards and Engineering Division policies and procedures for handling privileged information. Enclosure 3 also describes EPA contractor commitments and procedures for use of confidential materials. It is EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 3 provides sufficient protection for the rights of submitters of privileged information.

If you have any questions regarding this request, need assistance, or are unable to provide me with responses to the enclosed questions by July 27, 1987, please contact Mr. John Copeland at (919) 541-5597.

Sincerely



Jack R. Farmer
Director

Emission Standards and
Engineering Division

3 Enclosures

cc: Mr. Bruce Maillet, Director
Division of Air Quality Control
Massachusetts Department of Environmental Quality Engineering

Mr. Louis F. Gitto, Director
Air Management Division
U.S. EPA - Region I

Mr. Arthur Meisinger
Division of Industrial Minerals, U.S. Bureau of Mines

ENCLOSURE 1

INFORMATION REQUESTED

Please provide separate reports for each of the plants owned and operated by your company for which information is requested. If you have any questions regarding this questionnaire, please contact John Copeland of EPA at (919) 541-5597.

A. Vermiculite or Exfoliated Vermiculite Mining and Production - General Plant Information

1. a. Plant name _____
b. Address _____
2. a. Legal owner _____
b. Subsidiary of _____
3. Respondent
a. Name and title _____
b. Address _____
c. Telephone No. _____
4. Plant coordinates - latitude _____° _____ min _____ s
longitude _____° _____ min _____ s
5. Typical hours of operation
_____ hours/day _____ days/week _____ weeks/year
6. Please provide a brief description of the terrain features surrounding the plant. _____

7. What is the distance from the plant to the nearest residence? _____

Please return completed questionnaire to:

Jack R. Farmer
Director, ESED (MD-13)
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

8. Description of raw materials mined and processed for producing vermiculite or exfoliated vermiculite expressed in geological terms.

9. Raw material throughput in short tons for each of the last three years

1984 _____ 1985 _____ 1986 _____

10. Brief description of the end-products produced and production in tons of each achieved in 1986 (attach separate sheets as needed).

11. Descriptions and amounts (short tons) of any waste materials generated in 1986.

B. Vermiculite or Exfoliated Vermiculite Production - Description of Processes

1. Please provide a plan view drawing showing the relative locations of processing equipment, control devices, and any stockpiles of raw materials, products, and wastes. Identify stacks and other emission discharge points on the plan view.

2. Please provide detailed process flow diagrams showing the unit processes operated from primary crushing through product handling, packaging, and shipping. Indicate on the diagrams the location of local exhaust hoods and ventilation points, and spray nozzles if wet dust suppression techniques are used.

3. Please provide a thorough description of the crushing plant. The description should include the following information:

- a. Number, type (e.g., jaw, gyratory, cone, impact, etc.), size and capacity (tons per hour) of crushers used for primary, secondary, and tertiary crushing.
- b. Moisture content of feed materials at each crushing stage.
- c. Particle size of feed materials and discharge at each crushing stage.
- d. Number, type, dimensions, and number of decks of scalping and finishing screens used at each crushing stage.
- e. Particle size and destination of the oversize and undersize (throughs) at each screen deck.
- f. Location of exhaust hoods or other ventilation points. Include ventilation rates (cubic feet per minute) for each exhaust point identified.
- g. Description of any wet dust suppression techniques used, including location of sprays, application rates (gallons per minute), suppressant used (water only or water plus a surfactant), and supplier of surfactant, if used.

4. Conveying Systems

Description of conveying systems used throughout the plants. Include information on length and width, number of transfer points and emission control practices (exhaust hoods, wet suppression, covers, etc.).

5. Beneficiation Processes

Please describe any beneficiation process(es) in use. Identify any unit which processes dry materials and its associated air pollution control equipment.

6. Drying or Calcining Operations

If the material is dried (or calcined), please describe the equipment used (rotary kiln, fluid-bed, etc.), the source of process heat (i.e., natural gas, oil, etc.), production rate, and any associated air pollution control equipment.

7. Stockpiles

Please provide an inventory of outdoor product and waste stockpiles. Include for each stockpile a description of the material stored, the stockpile dimensions, and the percent material less than 200 mesh. Indicate whether the stockpiles are active or inactive, and describe any control practices (e.g., wind breaks, wetting, chemical stabilization, vegetation cover) employed.

8. Bagging or Packaging

Please describe any bagging or packaging operations, including a description of any hooding or wet dust suppression techniques applied.

9. Product Handling

Describe the manner in which bulk products are shipped from the plant (e.g., railcar; covered hopper, open hopper, gondola, etc; truck, ship, barge). Indicate method of product loading either through written description or on a drawing or plan.

C. Vermiculite or Exfoliated Vermiculite Production - Air Pollution Control Devices

For each air pollution control device applied, please provide the following information. If more than three control devices are used, copy this portion of the questionnaire before answering and attach additional sheets.

	<u>Control Devices</u>		
	<u>1</u>	<u>2</u>	<u>3</u>
1. General			
a. Type (baghouse, scrubber, ESP, etc.)			
b. Emission sources served			
c. Gas flow rate, acfm			
d. Gas temperature °F			
f. Outlet particulate loading, gr/dscf *			
g. Quantity of dust/sludge collected in 1986, tons			
h. Destination of dust/sludge			

* Indicate whether based on actual measurement or estimated.

2. Baghouses

a. Type (mechanical shaker, pulse jet, etc.)			
b. Number of compartments			
c. Cloth area, ft ²			
d. Air-to-cloth ratio, ft/min			
e. Bag material (woven, felted, Dacron, etc.)			
f. Cooling method (evaporative, air dilution, radiative)			

Control Devices

	1	2	3
3. Wet Scrubbers			
a. Type (venturi, rotoclone, etc.)			
b. Liquid flow rate, gpm			
c. Pressure drop, in. of water			
d. Liquid-to-gas ratio			
4. Electrostatic Precipitation			
a. Type (plate, tube)			
b. Number of parallel fields and stages per field			
c. Total plate area, ft ²			
d. Specific collection area, ft ² /1000 acfm			
e. Dust resistivity, ohm-cm			
f. Design efficiency, %			
g. Primary power supply			
Voltage, volts			
Current, amps			
h. Secondary power supply			
Voltage, kilovolts			
Current, milliamps			
i. Schematic of electrical sectionalization (attach)			
5. Stack Parameters			
Height, ft			
Diameter, inches			
Discharge velocity, fpm			
Gas temperature, °F			

D. Information on Major Raw Materials for Producing Vermiculite or Exfoliated Vermiculite (Submit separate form for each raw material.)

1. Description of raw material. _____

2. Source of raw material. _____

3. Fiber content characteristics of raw material.

a. Percent of following fibers in raw material. Specify whether percent by weight _____ area _____ other _____.

	<u>Min</u>	<u>Max</u>	<u>Best Estimate</u>	<u>Test code *</u>
Actinolite	_____	_____	_____	_____
Tremolite	_____	_____	_____	_____
Actinolite-Tremolite	_____	_____	_____	_____
Chrysotile-serpentinite	_____	_____	_____	_____
Riebeckite-crocidolite	_____	_____	_____	_____
Cumingtonite-Grunerite-Amosite	_____	_____	_____	_____
Anthophyllite	_____	_____	_____	_____
TOTAL	_____	_____	_____	_____

b. Fiber size distribution by type of fiber.

c. Total fiber content of collected material including non-asbestos fibers. Specify whether percent by weight

area _____ other _____.

<u>Min</u>	<u>Max</u>	<u>Best Estimate</u>	<u>Test code</u>
_____	_____	_____	_____

* Use the following for test codes:

Phase contrast
Polarized light
Scanning electron
Transmission electron
X-ray diffraction
Other (it is not necessary to specify)

Test Code

1
2
3
4
5
6

E. Vermiculite or Exfoliated Vermiculite Production - Information on Materials Collected by Air Pollution Control Devices (Submit separate form for each control device.)

1. Control device identification from Section C - Air Pollution Control Devices

2. Fiber content characteristics of collected material.

- a. Percent of following fibers in collected material. Specify whether percent by weight _____ area _____ other _____.

	<u>Min</u>	<u>Max</u>	<u>Estimate</u>	<u>Test code</u>
Actinolite	_____	_____	_____	_____
Tremolite	_____	_____	_____	_____
Actinolite-Tremolite	_____	_____	_____	_____
Chrysotile-serpentinite	_____	_____	_____	_____
Riebeckite-crocidolite	_____	_____	_____	_____
Cummingtonite-Grunerite-Amosite	_____	_____	_____	_____
Anthophyllite	_____	_____	_____	_____
TOTAL	_____	_____	_____	_____

- b. Fiber size distribution by type of fiber.

c. Total fiber content of raw material including non-asbestos fibers

Specify whether percent by weight _____ area _____ other _____.

<u>Min</u>	<u>Max</u>	<u>Best Estimate</u>	<u>Test code</u>
_____	_____	_____	_____

* Use the following for test codes:

	<u>Test Code</u>
Phase contrast	1
Polarized light	2
Scanning electron	3
Transmission electron	4
X-ray diffraction	5
Other (it is not necessary to specify)	6

ENCLOSURE 2

EPA's Information Gathering Authority
Under Section 114 of the Clean Air Act

Congress has given the U.S. Environmental Protection Agency broad authority to secure information needed in the development of new source performance standards for new stationary sources under Section 111 of the Clean Air Act (42 U.S.C. 7411). Among other things, Section 114 of the Act (42 U.S.C. 7414) authorizes EPA to make inspections, conduct tests, examine records, and require owners or operators of emission sources to submit information reasonably required for the purpose of developing such standards. In addition, the EPA Office of General Counsel has interpreted Section 114 to include authority to photograph or require submission of photographs of pertinent equipment, emissions, or both.

Under Section 114, EPA is empowered to obtain information described by that section even if you consider it to be confidential. You may, however, request that EPA treat such information as confidential. Information obtained under Section 114 and covered by such a request will ordinarily be released to the public only if EPA determines that the information is not entitled to confidential treatment.* Procedures to be used for making confidentiality determinations, substantive criteria to be used in such determinations, and special rules governing information obtained under Section 114 are set forth in 40 CFR Part 2 published in the Federal Register on September 1, 1976 (40 FR 36902).

Pursuant to §2.204(a) of EPA's Freedom of Information Act (FOIA) regulation, in the event a request is received, or it is determined that a request is likely to be received, or EPA desires to determine whether business information in its possession is entitled to confidential treatment even though no request

*Section 114 requires public availability of all emission data and authorizes disclosure of confidential information in certain circumstances. See 40 FR 36902 - 36912 (September 1, 1976).

for release of the information has been received (e.g. when EPA determines there is a need to disclose such information in the course of developing emission standards under Section 111 or 112 of the Clean Air Act), please be advised that EPA will seek, at that time, the following information to support your claim as required by §2.204(e)(4) of EPA's FOIA regulations:

1. Measures taken by your company to guard against undesired disclosure of the information to others;
2. The extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
3. Pertinent confidentiality determinations, if any, by EPA or other Federal agencies, and a copy of any such determination, or reference to it, if available; and
4. Whether your company asserts that disclosure of the information would be likely to result in substantial harmful effects on the business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

ENCLOSURE 3.

U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Emission Standards and Engineering Division

June 1982

Summary of ESED

Procedures for Safeguarding Confidential Business Information

1. Purpose

This memorandum summarizes Agency policy and procedures pertaining to the handling and safeguarding of information that may be entitled to confidential treatment for reasons of business confidentiality by the Emission Standards and Engineering Division (ESED), Office of Air Quality Planning and Standards, Office of Air, Noise, and Radiation, U.S. Environmental Protection Agency.

2. Other Applicable Documents:

- a. Clean Air Act as amended.
- b. 40 CFR, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information.
- c. EPA Security Manual, Part III, Chapters 8 and 9.

3. Exception:

This document was prepared as a summary of data gathering and handling procedures used by the Emission Standards and Engineering Division, Office of Air Quality Planning and Standards, EPA. Nothing in this document shall be construed as superseding or being in conflict with any applicable regulations, statutes, or policies to which EPA is subject.

4. Definition:

Confidential Business Information - Information as to which the source has asserted a claim of confidentiality. This information may be identified with such titles as trade secret, secret, administrative secret, company secret, secret proprietary, privileged, administrative confidential, company confidential, confidential proprietary, proprietary, etc. NOTE: These markings should not be confused with the classification markings of National Security information identified in Executive Order 11652.

5. Background:

Section 114(c) of the Clean Air Act as amended reads as follows:

"Any records, reports, or information obtained under subsection (a) shall be available to the public, except that upon a showing satisfactory to the Administrator by any person that records, reports, or information, or particular part thereof, (other than emission data) to which the Administration has access under this section if made public, would divulge methods or processes entitled to protection as trade secrets of such person, the Administrator shall consider such record, report, or information or particular portion thereof confidential in accordance with the purposes of Section 1905 of Title 18 of the United States Code, except that such record, report, or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out this Act or when relevant in any proceeding under this Act."

On September 1, 1976, EPA promulgated regulations (40 CFR Part 2) that govern the treatment of business information, including data obtained under Section 114 of the Clean Air Act. These regulations require EPA offices to include a notice with each request for information to inform the business (1) of its right to assert a claim of confidentiality covering part or all of the information, (2) of the method for asserting a claim, and (3) of the effect of failure to assert a claim at time of submission. In addition, the regulations (1) set forth procedures for the safeguarding of confidential information; (2) contain provisions for providing confidential information to authorized representatives; (3) contain provisions for the release of information to the Congress, Comptroller General, other Federal agencies, State and local governments, and Courts; (4) permit the disclosure of information within EPA to employees with an official need for the information; and (5) prohibit wrongful use of such information and describe penalties for wrongful disclosure. Further, the regulations contain the Agency's basic rules concerning the treatment of requests for information under the Freedom of Information Act (5 U.S.C. 552).

6. Procedures:

a. Request for Information

Each request originating in the Emission Standards and Engineering Division (ESED) for information made under the provisions of Section 114(a) is signed by the Division Director. The request includes ESED's standard enclosure "EPA's Information Gathering Authority Under Section 114 of the Clean Air Act," which was designed to meet the requirement of 40 CFR Part 2 discussed above.

b. Receipt of Confidential Business Information

Upon receipt of information for which confidential treatment has been requested, the Office of the Director (OD) directs the logging of the material and the establishment of a permanent file. If confidential treatment is requested, but is not specifically marked, the material will be stamped "Subject to Confidentiality Claim." If part of the material is claimed to be confidential, that portion is marked "Subject to Confidentiality Claim." In compliance with Sections 2.204 and 2.208 of 40 CFR Part 2, the Branch Chief responsible for the requested information reviews the information to determine whether it is likely to be confidential, in contrast to being available in the open literature, and whether it likely provides its holder with a competitive advantage. If the information is clearly not confidential, the Branch chief prepares a letter for signature of the Division Director, ESED, to notify the business of this finding. If the information is possibly confidential, the Branch Chief sends a memorandum to inform the Office of the Director, ESED, of this finding, gives a brief description of the material (what it is, how many pages, etc.), identifies it with the correct ESED project number, and lists those persons who are authorized to have access to the information. The information and memorandum are hand carried to the OD and filed with the material. EPA Form 1480-21, "Privileged Information Control Record," (Enclosure A) is also filed with the folder containing the information. If confidential business information is received from the owner via an authorized representative or a third party, the same procedure is followed, with the addition of clearly identifying the information and its source.

By regulation, information for which confidential treatment is requested must be so marked or designated by the submitter. EPA takes additional

measures to ensure that the proprietary designation is uniformly indicated and immediately observable. All unmarked or undesignated information (except as noted below) is freely releasable.

c. Storage of Confidential Business Information

Folders, documents, or material containing confidential business information (as defined) shall be secured, at a minimum, in a combination locked cabinet. Normal ESED procedure is to secure this information in a cabinet equipped with a security bar and locked using a four-way, changeable combination padlock. The locked file is under the control of the Office of the Director.

Knowledge of the combination of the locking device is limited to the minimum number of persons required to effectively maintain normal business operations. Records of the locking device combination may be made but shall be stored elsewhere in conformance with the requirements of the EPA Security Manual.

The combination of the lock is normally changed whenever a person with knowledge of the combination is transferred, terminates employment, or is no longer authorized access, or whenever the possibility exists that the combination may have been subjected to compromise.

Files may be checked out upon confirmation that the person is authorized to receive the information. All confidential files must be returned no later than 3:30 p.m. on the same day they are removed. The intended user must sign the Privileged Information Control Record in the presence of an Office of the Director staff member when the file is checked out and when it is returned.

The individual who signs out a confidential file is responsible for its safekeeping. The file must not be left unattended. The information must not be disclosed to any non-authorized personnel.

Storage procedures for confidential business information by an authorized representative of EPA (see Section d. below) must be, at a minimum, as secure as those established here for EPA. Whenever confidential business information is removed from the EPA files to be transmitted to an authorized representative, a memorandum is placed in the file indicating what information was transmitted, the date, and the recipient.

d. Access to Confidential Business Information

Only authorized EPA employees may open and distribute confidential business information.

Only EPA-employees who require and are authorized access to confidential business information in the performance of their official duties are permitted to review documents and, after reviewing, shall sign and date EPA Form 1480-21 (Enclosure A) to certify their access to the document.

The confidential business information file is controlled by the Office of the Director, ESED. Access to the information is strictly enforced by that office.

The ESED Branch through which the confidential business information has been requested or sent provides a memo for the record designating those personnel who are authorized to use confidential business information in performance of their official duties in a program under which confidential business information can be requested. No person is automatically entitled to access based solely on grade, position, or security clearance. A need to know must exist. Where a person with a need to know is not designated on the memo for the record, the applicable Branch Chief shall review that need and, if appropriate, prepare an amendment to the memo of record. In any case, the memo designating authorized personnel should be reviewed and revised from time to time to ensure that it is current.

Persons under contract to EPA to perform work for EPA may be designated authorized representatives if such designation is necessary in order for the contractor to carry out the work required by the contract. The following conditions apply when it has been determined that disclosure is necessary:

(1) The authorized contractor representative and its employees (a) may use such confidential information only for the purposes of carrying out the work required, (b) must refrain from disclosing the information to anyone other than EPA without having received from EPA prior written approval of each affected business or of an EPA legal office, and (c) must return to EPA all copies of the information (and any abstracts or excerpts therefrom) upon request or whenever the information is no longer required for the performance of the work.

(2) The authorized contractor representative must obtain a written agreement from each of its employees who will have access to the information

to honor the above-noted limitations. A copy of each such agreement must be furnished to EPA in a format substantially complying with that shown in Enclosure B before access is permitted.

(3) the authorized contractor representative must agree that the conditions in the contract concerning the use and disclosure of confidential business information are included for the benefit of, and shall be enforceable by, both EPA and any affected business having a proprietary interest in the information.

These requirements provide reasonable protection for the rights of owners of confidential business information.

Information may be released to or accessed by employees of other EPA elements only upon approval by the Director, ESED, of a written justification signed by a Division Director, or equivalent.

Requests from other Federal agencies, Congress, Comptroller General, Courts, etc., are handled by the Office of the Director, ESED.

Requests under the Freedom of Information Act are handled in accordance with 40 CFR, Part 2, Subpart A. The ESED Freedom of Information Coordinator must be consulted prior to responding to any request for information where a claim of confidentiality has been asserted or where there is reason to believe that a claim might be made if the business knew release was intended.

e. Use and Disclosure of Confidential Business Information

Confidential business information as defined may not be used in publications, supporting documents, memoranda, etc., that become a part of the public domain, except as provided for in 40 CFR, Chapter 1, Part 2, Subpart B.

Confidential business information may not be summarized, tabulated, photocopied, or in any other way reproduced without the express written approval of the Branch Chief responsible for the information request. Any authorized reproduction shall be sparing and all procedures herein, strictly followed. Further, all authorized reproductions must be introduced into the confidential business information control system and treated according to the same procedures applicable to the original confidential material.

EPA generated documents or material, or extracts of information containing confidential business information, shall be stamped "For Official Use Only" and include on the first page and/or cover sheet the following statement:

"This document contains data claimed to be confidential business information and shall be handled and stored in accordance with Part III, Chapter 9 of the EPA Security Manual."

f. Handling of Other Information

Reports, memoranda, documents, etc., prepared by EPA or its authorized representatives are not normally circulated outside EPA for comment or review prior to publication except in such cases as described above (6.d.3) wherein confidential business information is expressly included. However, because industrial-data-gathering visits, plant inspections, and source testing can involve inadvertent receipt of confidential business information, it is the policy of ESED to protect all parties involved in the following manner.

Prior to or at the inception of a plant inspection, data gathering visit, or source test, EPA or its authorized representatives discuss with a responsible industry official the information sought, how it is to be used, and how it is to be protected. A copy of this document may be provided upon request.

Following an inspection, visit, or test, a trip report will be prepared to include, as practicable, all information received by EPA or its authorized representative during the visit or test. The report may be prepared by either EPA or its authorized representative. The draft of that report will be clearly identified, on an enclosed, colored cover sheet as "Confidential Business - Pending Company Review." A second copy of the draft trip report will be made. It will be forwarded by EPA to the responsible industry official for review. The responsible industry official will be requested by cover letter to review the report, clearly mark any information considered to be confidential, and return the marked report to the responsible EPA employee within two weeks of receipt. The original draft will be kept in the confidential business information file until the marked-up copy is returned by the business firm.

When the reviewed copy of the report, as marked by the responsible plant official, is received by EPA, information designated confidential will be placed in the confidential business information files as described above. The original of the trip report will be edited to delete the confidential information and the trip report will be issued.

ENCLOSURE A

DO NOT DETACH

APPLICATION NO. _____

ENVIRONMENTAL PROTECTION AGENCY

PRIVILEGED INFORMATION CONTROL RECORD

The attached information was received under a pledge of confidence. Aside from any possible security classification, it is considered privileged information. This information must be severely restricted in its dissemination, being made available only to those Environmental Protection Agency officials with a valid need for it. All persons reviewing this information must sign below.

INFORMATION REFERRED TO:

NAME	SIGNATURE	DATE
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

UNAUTHORIZED DISCLOSURE OF THE ATTACHED INFORMATION IS PUNISHABLE BY \$1,000.00 FINE OR IMPRISONMENT NOT MORE THAN ONE YEAR, OR BOTH, AND REMOVAL FROM OFFICE OR EMPLOYMENT. (18 USC 1905)

DO NOT DETACH

ENCLOSURE B

TREATMENT OF CONFIDENTIAL INFORMATION

It is understood that performance under EPA Contract No. _____ will require the Contractor (_____) and its employees to have access to confidential information obtained by EPA under section _____ of the Clean Air Act. In fulfillment of the conditions of disclosure contained in the Contract, I _____, hereby affirm that I personally will honor the limitations expressed in the contract concerning my access to such information.

Specifically, I shall:

1. use the information only for the purpose of carrying out the work required by the Contract;
2. refrain from disclosing the information to anyone other than EPA without the prior written approval of each affected business or of an EPA legal office; and
3. return to EPA, through the Contractor, all copies of the information (and any abstracts or excerpts therefrom) upon request by the EPA Program Office or whenever the information is no longer required by the Contractor for the performance of work required by the Contract.

Dated this _____ day of _____, 1976.

Signature